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June 25, 2010

VIA OVERNIGHT DELIVERY

Mr. Charles L.A. Terreni
Chief Clerk/Administrator
SC Public Service Commission
101 Executive Center Dr., Ste. 100
Columbia, SC 29210
(803) 896-5100

Re: LIFECONNEX TELECOM, LLC
Docket No. 2010-180-C

Dear Mr. Terreni:

Enclosed please find for filing an original and twenty-five (25) copies of the company's pre-filed testimony. The company does not intend to engage in telemarketing in the State of South Carolina.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self-addressed, postage prepaid envelope I have provided.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

Angela Janssen
Legal Assistant to Lance J.M. Steinhart
Attorney for LIFECONNEX TELECOM, LLC

Enclosure

cc: Edward Heard
Nanette S. Edwards - ORS via e-mail: nsedwar@regstaff.sc.gov
Scott Elliott via e-mail: selliott@elliottlaw.us
Jackie Livingston via e-mail: jlivingston@elliottlaw.us

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BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2010-180-C

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PUBLIC SERVICE
COMMISSION

IN RE: APPLICATION OF)	
LIFECONNEX TELECOM, LLC)	
AUTHORITY TO OPERATE AS A)	DIRECT TESTIMONY
RESELLER OF INTEREXCHANGE)	OF PAUL T. WATSON
TELECOMMUNICATION SERVICES)	
WITHIN THE STATE OF)	
SOUTH CAROLINA)	

I. Introduction

1. **Q. Please state your name and business address.**
- A. My name is Paul T. Watson. My business address is 13700 Perdido Key Drive,
 Unit 222, Pensacola, Florida 32507.
2. **Q. By whom are you employed and in what capacity?**
- A. I am Chief Operating Officer of LifeConnex Telecom, LLC ("LifeConnex").
3. **Q. Please give a brief description of your background and experience in business
 and telecommunications.**
- A. My background and experience, as well as other members of the management team
 of LifeConnex, is set forth in Attachment 4 to our application.

1 7. **Q. Please describe the services LifeConnex intends to provide within the State of**
2 **South Carolina.**

3 A. LifeConnex seeks authority to operate as a reseller of intraLATA and interLATA
4 intrastate telecommunications services to the public on a statewide basis.
5 LifeConnex seeks authority to offer on a resale basis within South Carolina
6 intrastate, interLATA and, to the extent authorized by the Commission, intraLATA
7 direct-dialed services including (1+) service, flat rate service, 800 inbound service,
8 and travel cards and prepaid calling cards. LifeConnex seeks statewide authority to
9 provide intraLATA services authorized by the Commission in Docket Nos. 92-182-
10 C, 92-183-C, and 92-200-C. LifeConnex has no plans at this time to construct any
11 telecommunications transmission facilities of its own and seeks no construction
12 authority. LifeConnex will operate exclusively as a reseller. LifeConnex intends
13 to engage in "switchless" resale. LifeConnex will arrange for the traffic of
14 underlying subscribers to be routed directly over the networks of Applicant's
15 network providers.

16 8. **Q. What carrier will LifeConnex utilize as its underlying carriers for services in**
17 **South Carolina?**

18 A. LifeConnex intends to utilize BellSouth Telecommunications, Inc. d/b/a AT&T
19 South Carolina ("AT&T") or other facilities-based long distance companies as its
20 underlying carriers. LifeConnex will choose its underlying carriers based upon the
21 quality of service of the carrier properly certified by the Commission to provide
22 such service.
23

1 9. **Q. Is LifeConnex currently authorized to provide intrastate telecommunications**
2 **services in any other state?**

3 A. Yes. LifeConnex is currently authorized to provide such services in the following
4 states: Alabama, Arkansas, Colorado, D.C., Florida, Idaho, Indiana, Iowa, Kansas,
5 Kentucky, Louisiana, Massachusetts, Michigan, New Hampshire, New Jersey,
6 New Mexico, New York, North Carolina, North Dakota, Oklahoma, Oregon,
7 Rhode Island, South Carolina, Tennessee, Utah, Vermont, Washington and
8 Wisconsin. Lifeconnex was issued a Certificate of Public Convenience and
9 Necessity to Provide Local Exchange Services in the State of South Carolina per
10 Order dated July 14, 2009 in Docket No. 2008-428-C (issued in name of Swifitel,
11 LLC). The Commission issued an Order dated September 18, 2009 Approving
12 Change of Name to Lifeconnex Telecom, LLC.

13 10. **Q. Does LifeConnex intend to file a tariff with the Commission?**

14 A. Yes. LifeConnex filed a tariff along with its Application in this proceeding which it
15 will modify as necessary in order to meet the Commission's requirements. We
16 believe LifeConnex's Tariff will comport with all Orders, Rules, and Regulations of
17 the Commission.

18 11. **Q. Will LifeConnex comply with the Commission's orders regarding the resale of**
19 **interexchange carrier services?**

20 A. Yes. LifeConnex will at all times provide and market interexchange carrier services
21 in accordance with current Commission policies. In addition, LifeConnex at all
22 times will provide interstate services in compliance with all FCC rules and
23 regulations.
24

1 12. Q. Has LifeConnex provided any intrastate telecommunications services within
2 the State of South Carolina?

3 A. Yes.

4 13. Q. What rates will LifeConnex charge upon receipt of certification?

5 A. LifeConnex will charge the tariffed rates approved by the Commission.

6 14. Q. How will LifeConnex market services in South Carolina?

7 A. LifeConnex intends to market its services via direct sales by LifeConnex's
8 employees and independent sales agents.

9 III. Managerial, Technical and Financial Qualifications

10 15. Q. Does LifeConnex have sufficient managerial, technical, and financial resources
11 and ability to provide the telecommunications services proposed in its
12 Application?

13 A. Yes. LifeConnex has sufficient technical, financial, and managerial resources and
14 ability to provide the telecommunications services for which authority is sought
15 herein. LifeConnex's personnel represent a broad spectrum of business and
16 technical disciplines, possessing many years of individual and aggregate
17 telecommunications experience.

18 My qualifications and experience are discussed on Attachment 4 to our application,
19 which attachment also supports Applicant's managerial and technical ability to
20 provide the services for which authority is sought herein.
21

16. Q. How does LifeConnex handle customer service requests?

A. LifeConnex's customer service department handles all such requests. LifeConnex can be reached by toll free number.

17. Q. Please describe the financial condition of LifeConnex.

A. In support of LifeConnex's financial ability to provide the services sought herein, LifeConnex's Balance Sheet and Profit & Loss Statement as of October 31, 2009 was submitted as Attachment 5 to the Application.

IV. Public Interest

18. Q. How will residents of South Carolina benefit from LifeConnex's services and presence in South Carolina?

A. Commission approval should bring the following long-term benefits to telephone users:

- (1) More competition, additional services and a better product at competitive prices;
- (2) Increased consumer choice as well as innovative telecommunications services;
- (3) Efficient use of existing communications resources as well as increased diversification and reliability of supply of communications services;
- (4) Development of an expanded telecommunications supply industry in South Carolina;

1 (5) An expanded tax base and revenue source for the State of South Carolina;

2 And;

3 (6) Additional sources of revenues for Local Exchange Companies through
4 access charges and billing and collection fees.

5
6 19. Q. Will the Company agree to abide by and comply with the Commissions' Rules
7 and Regulations and Commission Orders in its operations in South Carolina?

8 A. Yes.

9 20. Q. Does this conclude your testimony?

10 A. Yes. I would like to thank the Commission for this opportunity to provide
11 information relevant to LifeConnex's Application and am ready to provide any
12 additional information that the Commission may need in making its decision.